

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ZL TECHNOLOGIES, INC.,
Plaintiff,

-against-

SHIELD FINANCIAL COMPLIANCE, LTD.;
SHIELD FINANCIAL COMPLIANCE, INC.;
KLDISCOVERY ONTRACK, LLC and
AARON GARDNER,
Defendants.

Case No. 1:25-cv-2673-JPO

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that the undersigned hereby moves this Court, before the Honorable J. Paul Oetken, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be determined by the Court, for an order and judgment dismissing Plaintiff's complaint with prejudice as to Defendant Aaron Gardner pursuant to Federal Rule of Civil Procedure 12(b)(6), and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
June 17, 2025

GROVE LAW PC

/s/ Hannah Sholl

Hannah Sholl
GROVE LAW PC
1460 Broadway
New York, New York 10036
Tel: (646) 480-6408
hsholl@grove.law

Attorney for Defendant Aaron Gardner